

FILED

COURT DEC -1 PM 1:20
TEXAS
CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

CRIMINAL NO.

A15 CR 350 SS
I N D I C T M E N T

**[Violations: 18 U.S.C. § 1591(a) and (b)(2),
Sex Trafficking of a Minor,
- Counts 1 and 2;
18 U.S.C. § 2423(a), Interstate
Transportation of a Minor to Engage in
Prostitution, - Count Three;
18 U.S.C. § 2, Aiding and Abetting]**

a/k/a "Rico"

a/k/a “Skinny”

Defendants.

COUNT ONE

That between June 1, 2015 and August 14, 2015, within the Western District of Texas and elsewhere, the Defendants.

and

aided and abetted by each other, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain, by any means, a person, C.M., and did cause C.M. to engage in a commercial sex act, knowing that C.M. had not attained the age of 18 years, recklessly disregarding that C.M. had not attained the age of 18 years, and having had a reasonable opportunity to observe C.M., in violation of Title 18, United States Code, Sections, 1591(a) and (b)(2) and Section 2.

COUNT TWO
[18 U.S.C. § 1591(a) and (b)(2) and § 2]

That between July 28, 2015 and August 26, 2015, within the Western District of Texas and elsewhere, the Defendants,

DEQWON SAQUOD LEWIS a/k/a “Rico”
and
STARISHA SHONTEL MOORE, a/k/a “Skinny”,

aided and abetted by each other, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain, by any means, a person, K.M., and did cause K.M. to engage in a commercial sex act, knowing that K.M. had not attained the age of 18 years, recklessly disregarding that K.M. had not attained the age of 18 years, and having had a reasonable opportunity to observe K.M.. in violation of Title 18, United States Code, Sections, 1591(a) and (b)(2) and Section 2.

COUNT THREE
[18 U.S.C. § 2423(a)]

Between August 10, 2015 and August 26, 2015 within the Western District of Texas and elsewhere, the Defendant,

DEQWON SAQUOD LEWIS a/k/a "Rico"
and
STARISHA SHONTEL MOORE a/k/a "Skinny",

aided and abetted by each other, did knowingly transport an individual, to wit, K.M., who had not attained the age of 18 years in interstate and foreign commerce from the State of Texas to the State of Michigan, with the intent that such individual engage in prostitution.

All in violation of Title 18, United States Code, Section 2423(a) and Section 2.

A TRUE BILL

SIGNATURE REDACTED PURSUANT
TO E-GOVERNMENT ACT OF 2002
FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

BY:


GRANT SPARKS
Assistant United States Attorney